

# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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File No. 31-380.10

The Honorable Mary Nichols, Chair  
California Air Resource Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812-2815

Via: Website Post: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Chair Nichols and Board Members:

**Subject: Comments on the Air Resources Board April 2016 Proposed Short-Lived  
Climate Pollutant Reduction Strategy Draft Environmental Analysis**

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to comment on the Appendix C Draft Environmental Analysis (EA), which is part of the Proposed Short-Lived Climate Pollutant Reduction Strategy (Strategy). The Sanitation Districts provide environmentally sound, cost-effective wastewater and solid waste management for about 5.3 million people in Los Angeles County and, in the process, convert waste into resources such as reclaimed water, energy, and recycled materials. The Sanitation Districts' service area covers approximately 800 square miles and encompasses 78 cities and unincorporated territory within the County through a partnership agreement with 24 independent special districts.

Our comments focus on two areas: the Chapter I overall approach, and the Alternatives analysis.

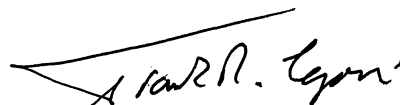
Under Chapter I (D)(2)(5), it is stated that the EA examines regional (e.g., air basin) and local issues to the degree feasible. In evaluating methane reduction from the municipal solid waste sector, no such analysis is undertaken. It is important to realize that providing effective management for diverting organic waste from landfills is highly dependent upon the region of the state and the environmental framework and regulations for that particular area. Northern California, including the Bay Area has a robust organics program and has been able to compost their diverted organic waste in more conventional compost operations. However, moving towards Central and Southern California, organics management will be heavily influenced by the stringent air quality regulations of the San Joaquin Valley Air Pollution Control District and South Coast Air Quality Management District, the only two extreme non-attainment air basins in the country. Combined, these two air basins would also represent a majority of the state's population. Regulations in the these air districts would make composting of food waste prohibitively expensive due to the high tech compost facilities needed to meet their respective

regulations. If the compost option was used, it would likely require transportation of the material out of the basins adding significantly to trucking emissions and cost. Anaerobic digestion may be the more likely management technique for these regions. Here, very little capacity exist for stand-alone digesters, so new facilities would need to be constructed with long time frames for siting, CEQA analysis and permitting. As suggested in the Strategy, municipal wastewater treatment plants have a significant amount of excess digester capacity that can be utilized in the short-term while infrastructure projects are completed. Separate letters from the wastewater industry detail the type and amount of financial incentives required to make this option feasible. We recommend that the EA undertake this level of analysis to truly represent the impact of the Strategy.

With regard to the Alternatives section of the EA, we believe that an inadequate analysis was performed with regard to the organic diversion goals of the Strategy. Both Alternative 1 and Alternative 2 examine landfill waste diversion if only the existing diversion mandates were in place; eliminating organics as proposed in the Strategy would not occur. It is stated on page 7-8 that *"If no regulation were developed to divert organics from landfills, SLCP emissions reductions associated with waste management in the State may not materialize, failing to satisfy Objective 3."* CARB makes this statement without presenting any data analysis to support this conclusion. However, a complete analysis is performed as part of the solid waste industry coalition letter which has been submitted separately. In the letter's Attachment A, a detailed analysis is conducted assuming only the landfill diversion efforts specified in AB 341, AB1826, and AB1594 are in place, as well as the methane reductions from CARB's Landfill Methane Reduction Regulation. The analysis concludes that the existing regulations and mandates will essentially achieve most, if not all of the GHG emission reductions envisioned by essentially eliminating organics from landfills. We strongly recommend that CARB staff revisit the EA Alternative sections in light of this information.

Thank you for the opportunity to comment on the draft EA. If you have any questions, please do not hesitate to contact the undersigned at this office.

Very truly yours,



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